

Message

From: Stephen Treimel [Stephen.Treimel@erg.com]
Sent: 11/15/2018 9:42:23 PM
To: Hambrick, Amy [Hambrick.Amy@epa.gov]
CC: Tracy Curtis [Tracy.curtis@erg.com]; Treimel Treimel [stephen.treimel@erg.com]
Subject: Request for Updated Information on # of Respondents Subject to NSPS Subpart OOOO
Attachments: 2437ss03.docx

Ms. Amy Hambrick,

My company, Eastern Research Group, is assisting US EPA in drafting ICR renewals for various NSPS and NESHAP source categories.

I wanted to get updated information on the source category for the NSPS for Oil and Natural Gas Production and Natural Gas Transmission and Distribution - 40 CFR Part 60, Subpart OOOO.

The previous ICR for NSPS Subpart OOOO (EPA ICR Number 2437.03, EPA-HQ-OECA-2014-0102, OMB Control Number 2060-0673) (copy attached) indicated that 596 respondents (564 existing sources: 300 exploration and production businesses, 136 transmission and storage operations, 116 processing plants, and 12 sweetening units AND 32 new sources: 29 processing plants and 3 sweetening units) would be subject to the standard over the three year period following the renewal of the ICR in late 2015. I would like to find out if the estimates for existing and new sources subject to Subpart OOOO are still accurate, including whether you have any new estimates on the breakdown of affected facilities.

I understand that you wrote the amendments for NSPS Subpart OOOO and established the new NSPS Subpart OOOOa. Should we expect any new respondents under Subpart OOOO over the next three years, as sources constructed after 9/18/15 should be subject to NSPS Subpart OOOOa? Finally, can you confirm that the updates to Subpart OOOO in the June 2016 final rule did not introduce new burden (monitoring, recordkeeping or reporting) requirements?

Thank you.

Stephen

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